

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
FOLEY SQUARE BRANCH

-----X
LACONIA PROPERTIES LLC.,

07 CV 6220 (LAP)

Plaintiffs,

**RULE 26
INITIAL
DISCLOSURE**

- against -

TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/k/a ST PAUL
TRAVELERS INSURANCE COMPANY,

Defendant.

-----X

Defendant TRAVELERS PROPERTY CASUALTY COMPANY OF
AMERICA, incorrectly sued herein as TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/k/a ST PAUL TRAVELERS INSURANCE
COMPANY, hereinafter referred to as "TRAVELERS", by its attorneys, SPEYER
& PERLBERG, LLP, hereby sets forth as and for TRAVELERS' Voluntary
Disclosure pursuant to Rule 26 of the Federal Rules of Civil Procedure, as
follows:

A. The name and, if known, the address and telephone number of
each individual likely to have discoverable information that the disclosing party
may use to support its claims or defenses, unless solely for impeachment,
identifying the subjects of the information:

1. Gerald T. Lowenwirth, TRAVELERS, P.O. Box 1060, Yonkers, New
York 10704. Telephone (631) 577-7261.
2. Charlann Solomon, TRAVELERS, PO Box 9093, 100 Baylis Road,
Melville, New York 11747. Telephone (631) 577-7361.

3. Frank Gangemi, last known address, New York City Department of Buildings, Bronx Borough Office, 1932 Arthur Ave., 5th Floor, Bronx, NY 10457, (718) 579-6920.

4. Principals, employees and/or agents of LACONIA PROPERTIES LLC ("LACONIA") and its parents, subsidiaries and affiliates, 128 South Road, Stanfordville, New York, 12521.

5. Stephen Katos, LACONIA, 128 South Road, Stanfordville, New York, 12521.

6. Michael Katos, LACONIA, 128 South Road, Stanfordville, New York, 12521.

7. Daniel P. Ferry, LACONIA, 21-11 31st Street, Astoria, New York 11105. Telephone (718) 932-5600 x 203.

8. Bradley R. Huntington, P.E. and principals, employees and/or agents of Tri-State Engineering, P.C., 1992 Commerce Street, Suite 204, Yorktown Heights, New York 10598. Telephone (914) 962-3692.

9. Neil Schmelkin, P.E. and principals, employees and/or agents of Tauscher Cronacher Professional Engineers, P.C., 265 Sunrise Highway, Suite 33, Rockville Centre, New York 11570. Telephone (516) 766-1019.

10. George Kondos and principals, employees and/or agents, 21-11 31st Street, Astoria, New York 11105.

11. Bryan E. Flynn, P.E. and principals, employees and/or agents, 78-66 79th Place, Glendale, New York 11385. Telephone (718) 894-7822.

12. Guy Penza and principals, employees and/or agents of Penza Affiliates, Ltd. 1767 Bath Avenue, Brooklyn, New York 11214.
13. Michael Theolopos and principals, employees and/or agents of Chian Contractors, 24-32 45th Street, Astoria, New York 11103
14. Christopher J. Downes and principals, employees and/or agents of Everest Scaffolding, Inc., 420 Manida Street, Bronx, New York 10474. Telephone (718) 328-1004.
15. Principals, employees and/or agents of Remy Builder's Corp., 26-36 18th Street, Long Island City, Queens, New York 11102. Telephone (718) 545-8960.
16. William Gati, RA and principals, employees and/or agents of Architecture Studio, 112-31 84th Avenue, Kew Gardens, New York 11418
17. Saleh H. Alqifi and principals, employees and/or agents of Orion Newsstand Corp., 4135 Laconia Avenue, Bronx, New York 10466.
18. Principals, employees and/or agents of 1681 Grocery, 4131 Laconia Avenue, Bronx, New York 10466.
19. Margarita Ozuna and principals, employees and/or agents of Laconia Beauty Salon, 4139 Laconia Avenue, Bronx, New York 10466.
20. Fun Non Chen, and principals, employees and/or agents of "Chinese Restaurant", 4129 Laconia Avenue, Bronx, New York 10466.
21. Yong Qu and principals, employees and/or agents of Asia America Supermarket, Inc., 4141 Laconia Avenue, Bronx, New York 10466.

22. Neil Kadre and principals, employees and/or agents of "Liquor Store", 4133 Laconia Avenue, Bronx, New York 10466.

23. Chung Sung Kim and principals, employees and/or agents of Laconia Cleaners, 4137 Laconia Avenue, Bronx, New York 10466.

B. A copy of, or description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment purposes.

1. Policy of insurance issued October 7, 2005 by Travelers Property Casualty Company of America to Laconia Properties LLC, policy # I-660-3891B218-TIL-05, with a policy period of November 22, 2005 to November 22, 2006, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

2. Documents maintained by TRAVELERS with regard to Claim # CEJ0194, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

3. Report of Tri-State Engineering, P.C. dated July 25, 2007, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

4. Report of Tri-State Engineering, P.C. dated November 15, 2006, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

5. Report of Tauscher Cronacher Professional Engineers, P.C. dated August 3, 2004, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

6. Report of Tauscher Cronacher Professional Engineers, P.C. dated October 11, 2006, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

7. Documents submitted by LACONIA to TRAVELERS by letter dated December 6, 2006 of Penza Affiliates, Ltd. regarding Claim # CEJ0194, in defendant's possession at the law offices of Speyer & Perlberg, LLP.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

NOT APPLICABLE.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. Policy of insurance issued October 7, 2005 by Travelers Property Casualty Company of America to Laconia Properties LLC, policy # I-660-3891B218-TIL-05, with a policy period of November 22, 2005 to November 22, 2006.

Dated: Melville, NY
October 19, 2007

Yours, etc.
SPEYER & PERLBERG, LLP

By: 

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s/current/meg/Laconia/Rule 26 Initial Disclosure.doc